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6 **UNITED STATES DISTRICT COURT**  
7 **WESTERN DISTRICT OF WASHINGTON**  
8 **AT SEATTLE**

9 ST LIBERTY LLC

10 Plaintiff,

11 v.

12 M/V R AN R, USCG Official No. 1069265,  
13 her engines, boilers, tackles and other  
14 appurtenances, etc., *in rem*; and Robert W,  
15 Russell, *in personam*,

16 Defendants.

Civil Action No. 2:20-cv-00343-BJR

17 **STIPULATION AND ORDER**  
18 **ALLOWING INSPECTION OF**  
19 **DEFENDANT VESSEL**

20 **STIPULATION**

21 Pursuant to this Court's Order Authorizing Issuance of Warrant for Arrest of Vessel In Rem  
22 dated March 3, 2020, Dkt. No. 8, the U.S. Marshal arrested the defendant vessel M/V R AN R (the  
23 "Vessel") on March 10, 2020. Dkt. No. 13.

24 Plaintiff ST Liberty LLC ("STL") and Defendants M/V R AN R and Robert W. Russell  
25 (collectively the "Russells"), by and through their attorneys, now stipulate that the following  
26 individuals be allowed to board the Vessel under the supervision of a representative of Marine  
27 Lenders Services, LLC, Substitute Custodian, for the sole purpose of inspection of the Vessel,  
provided that each signs a Waiver and Release of Liability form prior to boarding: Robert W.  
Russell, Sonja Russell, the Russell's designated representative, STL's designated representative,

**STIPULATION AND ORDER ALLOWING**  
**INSPECTION OF VESSEL**  
CASE NO. 2:20-CV-00343-BJR - 1

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1 and any other individual approved in advance by both of the Parties. Plaintiff and Defendants  
2 agree to each pay one-half of the Substitute Custodian's fees for opening the Vessel and supervising  
3 the joint inspection of the Vessel by the Parties and/or their designated representatives.

4       Upon acceptance and approval of this Stipulation by the Court, the Substitute Custodian  
5 shall permit the inspection of the Vessel, as set forth above.

6       IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.  
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8  
9 DATED this 6th day of August 2020.

COLLIER WALSH NAKAZAWA LLP

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19       Attorneys for Plaintiff ST LIBERTY LLC

20 DATED this 6th day of August 2020.

BUCHALTER

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**STIPULATION AND ORDER ALLOWING  
INSPECTION OF VESSEL**  
CASE NO. 2:20-CV-00343-BJR - 2

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**ORDER**

This matter having come on regularly for consideration before the Court upon the above and foregoing Stipulation, and the Court being fully advised of the matter, it is hereby ORDERED:

1. Robert W. Russell, Sonja Russell, the Russell's designated representative, STL's designated representative, and any other individual approved by both Parties shall be permitted to board the Vessel for the purpose of inspecting it under the supervision of the Substitute Custodian, Marine Lenders Services, LLC., provided that each signs a Waiver and Release of Liability form prior to boarding.
2. The Substitute Custodian shall make its representative available to open the Vessel and supervise the joint inspection of the Vessel by the Parties and/or their designated representatives at the earliest time reasonably possible. Plaintiff and Defendants shall each pay one-half of the Substitute Custodian's fee for this joint inspection.

DATED this 7th day of August 2020.



The Honorable Barbara J. Rothstein  
United States District Judge